

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

UNITED STATES OF AMERICA)
) **Case No.: 1:17-CR-00027**
v.)
 JUDGE JONES
)
JOEL A. SMITHERS)

MOTION TO SEAL

COMES NOW THE UNITED STATES, by undersigned counsel, and respectfully requests the Court seal Exhibit 2 of the United States' Expert Witness Notice for Dr. Stacey Hail, ECF No. 377. The United States requests this exhibit be sealed due to the sensitive nature of report concerning medical records, in addition to the personal identifying information contained therein. Wherefore, the United States respectfully requests this exhibit be filed under seal.

Respectfully submitted, this the 28th day of May, 2024.

CHRISTOPHER R. KAVANAUGH
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Western District of Virginia

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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2024, a copy of the foregoing was filed in the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other interested parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

By: s/ M. Suzanne Kerney-Quillen
M. Suzanne Kerney-Quillen
Special Assistant United States Attorney